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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,	)	
	)	Case No.: 2:14-cr-00178-JAD-GWF
Plaintiff,	)	
	)	STIPULATION TO CONTINUE MOTION
vs.	)	DEADLINES AND HEARING
	)	(6th request)
IAN PINCOMBE,	)	
	)	
Defendants.	)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United States Attorney; Allison L. Herr, Special Assistant United States Attorney, counsel for the United States of America and Jennifer Waldo, Esq., counsel for defendant Ian Pincombe, that the deadline for the government to file its response to the Defendant's Motion to Dismiss be continued to July 3, 2015, and that the hearing currently scheduled for June 22, 2015 at 1:30 pm be continued for a period of 30 days.

This Stipulation is entered into for the following reasons:

1. The parties are in the midst of plea negotiations, which if successful would obviate the need for the Defendant's Motion. These negotiations however have been complicated by certain disputes over the factual averments to which the Defendant will be pleading requiring time to research and negotiate language for the same.

2. The additional time requested is not sought for the purposes of delay, but to allow counsel sufficient time to complete negotiations.

3. The parties agree to the continuance.

4. The defendant is in custody and does not object to a short continuance.

5. Denial of this request could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code §3161(h)(7)(A), considering the factors under Title 18, United States Code §3161(h)(7)(B) and § 3161(h)(7)(B)(iv).

6. This is the sixth request to continue the hearing.

DATED this 19th day of June, 2015.

DANIEL G. BOGDEN  
United States Attorney

JENNIFER WALDO  
Attorney for Defendant

By: /s/ Allison Herr  
ALLISON L. HERR  
Special Assistant United States Attorney

By: /s/ Jennifer Waldo  
JENNIFER WALDO

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,	)	
	)	Case No.: 2:14-cr-00178-JAD-GWF
Plaintiff,	)	
	)	FINDINGS OF FACT, CONCLUSION OF
vs.	)	LAW AND ORDER
	)	
IAN PINCOMBE,	)	
	)	
Defendants.	)	
	)	

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Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

1. The parties are in the midst of plea negotiations, which if successful would obviate the need for the Defendant's Motion. These negotiations however have been complicated by certain disputes over the factual averments to which the Defendant will be pleading requiring time to research and negotiate language for the same.

2. The additional time requested is not sought for the purposes of delay, but to allow counsel sufficient time to complete negotiations.

3. The parties agree to the continuance.

4. The defendant is in custody and does not object to a short continuance.

5. Denial of this request could result in a miscarriage of justice. The additional time requested by this Stipulation is excludable in computing the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United States Code §3161(h)(7)(A), considering the factors under Title 18, United States Code §3161(h)(7)(B) and § 3161(h)(7)(B)(iv).

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DATED this 19<sup>th</sup> day of June, 2015.

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